

1 Thomas R. Kreller (CA 161922)  
TKreller@milbank.com  
2 Linda Dakin-Grimm (CA 119630)  
LDakin-grimm@milbank.com  
3 Andrew B. Lichtenberg (*pro hac vice*)  
ALichtenberg@milbank.com  
4 Katherine Kelly Fell (*pro hac vice*)  
KFell@milbank.com  
5 Ashley A. Satterlee (*pro hac vice*)  
ASatterlee@milbank.com  
6 MILBANK LLP  
2029 Century Park East, 33rd Fl.  
7 Los Angeles, CA 90067  
Telephone: 424-386-4000  
8 Facsimile: 213-892-4704

9 Andrea Ramos (CA 162531)  
aramos@swlaw.edu  
10 Clinical Professor of Law  
Director of Immigration Law Clinic  
11 Southwestern Law School  
3050 Wilshire Boulevard  
12 Los Angeles, CA 90010  
Telephone: 213 738-7922  
13 Facsimile: 213 738-5751  
*Attorneys for Plaintiffs*

14  
15 **UNITED STATES DISTRICT COURT**

16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 A.O., A.S.R, L.C., R.M., and I.Z.M., on behalf  
18 of themselves and all others similarly situated,

19 Plaintiffs,

20 v.

21 KENNETH T. CUCCINELLI, Acting  
22 Director, U.S. Citizenship and Immigration  
Services, KEVIN K. MCALEENAN, Acting  
23 Secretary, U.S. Department of Homeland  
Security, ROBERT COWAN, Director,  
24 National Benefits Center, U.S. Citizenship and  
Immigration Services, UNITED STATES  
25 DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES  
26 CITIZENSHIP AND IMMIGRATION  
SERVICES.

27  
28 Defendants.

Case No. 5:19-CV-06151-SVK

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO FILE  
CERTIFIED ADMINISTRATIVE  
RECORD AND TO EXTEND CLASS  
CERTIFICATION BRIEFING  
SCHEDULE**

The parties, through counsel, hereby stipulate and request the Court to extend by two weeks (1) the deadline for Defendants to file the Certified Administrative Record and (2) the class certification briefing schedule. This is the second request by the parties to extend the class certification briefing schedule. In its Order on Joint Discovery Letter Dated July 23, 2020, Dkt. No. 94, the Court stated that Plaintiffs may request an extension to the class certification briefing schedule. The parties request a brief extension given the ongoing settlement negotiations before Magistrate Judge Ryu.

The parties request that the Court extend the deadlines to:

- a. September 14, 2020: Deadline to File Motion for Class Certification
- b. September 15, 2020: Deadline to file the Certified Administrative Record
- c. October 21, 2020: Deadline to Oppose Class Certification
- d. November 16, 2020: Deadline to Reply in Further Support of Class Certification

The parties further request a stay of the hearing on the motion for class certification to December 1, 2020. No other motions or hearings are scheduled at this time. The parties may request another extension or stay depending on the status of the parties' settlement negotiations.

Dated: August 27, 2020

By: /s/ Ashley A. Satterlee

**MILBANK LLP**

THOMAS R. KRELLER

LINDA DAKIN-GRIMM

ANDREW B. LICHTENBERG

KATHERINE KELLY FELL

ASHLEY A. SATTERLEE

**SOUTHWESTERN LAW SCHOOL**

ANDREA RAMOS

*Attorneys for Plaintiffs*

1 Dated: August 27, 2020

2 DAVID L. ANDERSON  
3 United States Attorney

4 By: /s/ Kate Masetta-Alvarez

5 JAMES A. SCHARF  
6 Assistant United States Attorney

7 KATE MASETTA-ALVAREZ  
8 Trial Attorney  
9 United States Department of Justice  
10 Office of Immigration Litigation

11 *Attorneys for Defendants*  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

[PROPOSED] ORDER

GOOD CAUSE APPEARING AND PURSUANT TO STIPULATION, Defendants will file the Certified Administrative Record by September 15, 2020. Plaintiffs shall file their motion for class certification by September 14, 2020; Defendants shall file their opposition brief to the motion for class certification by October 21, 2020; and Plaintiffs shall file their reply brief by November 16, 2020. The hearing on the motion for class certification will take place on December 1, 2020 at 10:00 a.m.

**IT IS SO ORDERED**

Dated: August \_\_, 2020

---

HON. SUSAN VAN KEULEN

United States Magistrate Judge